

REMARKS

Claim 39 is amended herein. Claims 1-68 are rejected. Claims 1-68 remain pending. Applicants respectfully request reconsideration in view of the remarks set forth below.

35 U.S.C. §102 Rejections

Claims 39-40 and 43 are rejected under 35 U.S.C. §102(e) as being anticipated by Bick, U.S. Patent No. 6,924,789 (hereinafter Bick).

CLAIMS 39-40 and 43

Applicants respectfully submit that Claim 39 is amended herein for clerical reasons. Further, Applicants respectfully assert that Bick does not teach subject matter recited in independent Claim 39. For instance, Independent Claim 39 recites in part:

a capacitive sensor that is coupled to said keymat and said keypad structure, wherein said capacitive sensor is integrated within said keymat.

Applicants respectfully assert that Bick fails to teach the capacitive sensor integrated within the keymat as recited in Independent Claim 39 and clearly shown in Figure 11 and described in the Specification including page 26 lines 20 through page 27 lines 10. Specifically, “capacitive sensor device 1104 has been integrated within the rubber material of keymat assembly 1100.”

Instead, Applicants respectfully assert that Bick teaches a capacitive sensor 19 that is positioned below a keymat 17 (see Figs. 3 and 4; col. 2, lines 51-53). Since Bick fails to teach the capacitive sensor integrated within the keymat as recited in Independent Claim 39, Applicants respectfully contend that Bick cannot anticipate amended Claim 39. Therefore, Applicants respectfully submit that Independent Claim 39 is allowable over Bick.

Furthermore, since Claims 40 and 43 depend from Independent Claim 39, Applicants respectfully submit that Claims 40 and 43 derive patentability at least therefrom.

35 U.S.C. §103 Rejections

Claim 41 is rejected under 35 U.S.C. §103(a) as being unpatentable over Bick. Claims 1-4, 13-15, 21, 25, 26, 44-46, 55-59, 67 and 68 are rejected under 35 U.S.C.

§103(a) as being unpatentable over Bick in view of Seely et al., U.S. Patent No. 6,188,391 (hereinafter Seely). Claims 5-12, 16-20, 22-24, 47-54 and 60-66 are rejected under 35 U.S.C. §103(a) as being unpatentable over Bick and Seely as applied to Claims 1, 2, 14, 15, 39, 44, 45 and 58, and further in view of Kleinhans et al., U.S. Patent No. 6,664,489 (hereinafter Kleinhans). Claims 27-38 are rejected under 35 U.S.C. §103(a) as being unpatentable over Bick in view of Seely and Kleinhans.

CLAIM 41

Applicants respectfully assert that Bick fails to teach or suggest subject matter recited within Claim 41. For instance, Claim 41 recites:

wherein said keymat comprises a rubber material.

The Examiner has stated that Bick does not disclose wherein the keymat comprises a rubber material. The Applicants respectfully agree.

However, the Examiner states that Bick teaches the keymat comprises an adhesive material...and the Examiner says that rubber-based adhesive is old and well known in the art. With this assertion, the Applicants respectfully disagree.

On page 27 lines 5-9 of the Specification, the keymat assembly is clearly defined. Specifically, the keymat assembly 1100 within which the capacitive sensor is integrated is a rubber material as clearly claimed. That is, in regard to Claim 41, the keymat is not just an adhesive it is an actual rubber material structure that is deformable to actuate switch sensors. Further description of the operation of a keymat, which differentiates it from a glob of rubber based adhesive, can be found in the specification on page 8 lines 10-20.

For this reason, Applicants respectfully submit that Claim 41 is not taught or rendered obvious in view of Bick. Therefore, Applicants respectfully assert that Claim 41 is allowable.

CLAIMS 1-4 and 13

Applicants respectfully assert that Bick and Seely, alone or in combination, fail to teach or suggest subject matter recited within Independent Claim 1. For instance, Independent Claim 1 recites in part:

a substantially transparent single sheet capacitive sensor, said
substantially transparent single sheet capacitive sensor configured to be

disposed within said keypad assembly without requiring the formation of key post holes therethrough, said substantially transparent single sheet capacitive sensor is coupled to a keymat and a keypad structure, said substantially transparent single sheet capacitive sensor integrated within said keymat;

Applicants respectfully contend that Bick and Seely, alone or in combination, do not teach or suggest the substantially transparent single sheet capacitive sensor integrated within the keymat as recited in Independent Claim 1. Since Bick and Seely, alone or in combination, fail to teach or suggest at least one element recited in Independent Claim 1, Applicants respectfully contend that Independent Claim 1 is not rendered obvious by Bick and Seely. Therefore, Applicants respectfully submit that Independent Claim 1 is allowable over Bick and Seely.

Also, since Claims 2-4 and 13 depend from Independent Claim 1, Applicants respectfully submit Claims 2-4 and 13 derive patentability at least therefrom.

CLAIMS 14, 15, 21, 25 and 26

Applicants respectfully contend that Bick and Seely, alone or in combination, fail to teach or suggest subject matter recited within Independent Claim 14. For instance, Independent Claim 14 recites in part:

wherein said capacitive sensing device is coupled to a keymat and a keypad structure, said capacitive sensing device integrated within said keymat.

Applicants respectfully contend that Bick and Seely, alone or in combination, do not teach or suggest the capacitive sensing device integrated within the keymat as recited in Independent Claim 14. Since Bick and Seely, alone or in combination, fail to teach or suggest at least one element recited in Independent Claim 14, Applicants respectfully contend that Independent Claim 14 is not rendered obvious by Bick and Seely.

Therefore, Applicants respectfully submit that Independent Claim 14 is allowable over Bick and Seely.

Additionally, since Claims 15, 21, 25 and 26 depend from Independent Claim 14, Applicants respectfully submit Claims 15, 21, 25 and 26 derive patentability at least therefrom.

CLAIMS 44-46 and 55-57

Applicants respectfully assert that Bick and Seely, alone or in combination, fail to teach or suggest subject matter recited within Independent Claim 39. For instance, Independent Claim 39 recites in part:

a capacitive sensor that is coupled to said keymat and said keypad structure, wherein said capacitive sensor integrated within said keymat.

For the reasons previously presented herein, Applicants respectfully contend that Bick and Seely, alone or in combination, do not teach or suggest the capacitive sensor integrated within the keymat as recited in Independent Claim 39. Since Bick and Seely, alone or in combination, fail to teach or suggest at least one element recited in Independent Claim 39, Applicants respectfully contend that Independent Claim 39 is not rendered obvious by Bick and Seely. Therefore, Applicants respectfully submit that Independent Claim 39 is allowable over Bick and Seely.

Moreover, since Claims 44-46 and 55-57 depend from Independent Claim 39, Applicants respectfully submit Claims 44-46 and 55-57 derive patentability at least therefrom.

CLAIMS 58, 59, 67 and 68

Applicants respectfully assert that Bick and Seely, alone or in combination, fail to teach or suggest subject matter recited within Independent Claim 58. For instance, Independent Claim 58 recites in part:

wherein said capacitive sensing device is coupled to a keymat and a keypad structure, said capacitive sensing device integrated within said keymat.

Applicants respectfully contend that Bick and Seely, alone or in combination, do not teach or suggest the capacitive sensor integrated within the keymat as recited in Independent Claim 58. Since Bick and Seely, alone or in combination, fail to teach or suggest at least one element recited in Independent Claim 58, Applicants respectfully contend that Independent Claim 58 is not rendered obvious by Bick and Seely. Therefore, Applicants respectfully submit that Independent Claim 58 is allowable over Bick and Seely.

Furthermore, since Claims 59, 67 and 68 depend from Independent Claim 58, Applicants respectfully submit Claims 59, 67 and 68 derive patentability at least therefrom.

CLAIMS 5-12

Applicants respectfully assert that Bick, Seely and Kleinhans, alone or in combination, fail to teach or suggest subject matter recited within Independent Claim 1. For instance, Independent Claim 1 recites in part:

a substantially transparent single sheet capacitive sensor, said substantially transparent single sheet capacitive sensor configured to be

disposed within said keypad assembly without requiring the formation of key post holes therethrough, said substantially transparent single sheet capacitive sensor is coupled to a keymat and a keypad structure, said substantially transparent single sheet capacitive sensor integrated within said keymat;

Applicants respectfully contend that Bick, Seely and Kleinhans, alone or in combination, do not teach or suggest the substantially transparent single sheet capacitive sensor integrated within the keymat as recited in Independent Claim 1. Since Bick, Seely and Kleinhans, alone or in combination, fail to teach or suggest at least one element recited in Independent Claim 1, Applicants respectfully contend that Independent Claim 1 is not rendered obvious by Bick, Seely and Kleinhans. Therefore, Applicants respectfully submit that Independent Claim 1 is allowable over Bick, Seely and Kleinhans.

Additionally, since Claims 5-12 depend from Independent Claim 1, Applicants respectfully submit Claims 5-12 derive patentability at least therefrom.

CLAIMS 16-20 and 22-24

Applicants respectfully contend that Bick, Seely and Kleinhans, alone or in combination, fail to teach or suggest subject matter recited within Independent Claim 14. For instance, Independent Claim 14 recites in part:

wherein said capacitive sensing device is coupled to a keymat and a keypad structure, said capacitive sensing device integrated within said keymat.

Applicants respectfully contend that Bick, Seely and Kleinhans, alone or in combination, do not teach or suggest the capacitive sensing device integrated within the keymat as recited in Independent Claim 14. Since Bick, Seely and Kleinhans, alone or in combination, fail to teach or suggest at least one element recited in Independent Claim 14, Applicants respectfully contend that Independent Claim 14 is not rendered obvious by Bick, Seely and Kleinhans. Therefore, Applicants respectfully submit that Independent Claim 14 is allowable over Bick, Seely and Kleinhans.

Furthermore, since Claims 16-20 and 22-24 depend from Independent Claim 14, Applicants respectfully submit Claims 16-20 and 22-24 derive patentability at least therefrom.

CLAIMS 47-54

Applicants respectfully assert that Bick, Seely and Kleinhans, alone or in combination, fail to teach or suggest subject matter recited within Independent Claim 39. For instance, Independent Claim 39 recites in part (emphasis added):

a capacitive sensor that is coupled to said keymat and said keypad structure, wherein said capacitive sensor integrated within said keymat.

For the reasons previously presented herein, Applicants respectfully contend that Bick, Seely and Kleinhans, alone or in combination, do not teach or suggest the capacitive sensor integrated within the keymat as recited in Independent Claim 39. Since Bick, Seely and Kleinhans, alone or in combination, fail to teach or suggest at least one element recited in Independent Claim 39, Applicants respectfully contend that Independent Claim 39 is not rendered obvious by Bick, Seely and Kleinhans. Therefore, Applicants respectfully submit that Independent Claim 39 is allowable over Bick, Seely and Kleinhans.

Moreover, since Claims 47-54 depend from Independent Claim 39, Applicants respectfully submit Claims 47-54 derive patentability at least therefrom.

CLAIMS 60-66

Applicants respectfully assert that Bick, Seely and Kleinhans, alone or in combination, fail to teach or suggest subject matter recited within Independent Claim 58. For instance, Independent Claim 58 recites in part:

wherein said capacitive sensing device is coupled to a keymat and a keypad structure, said capacitive sensing device integrated within said keymat.

Applicants respectfully contend that Bick, Seely and Kleinhans, alone or in combination, do not teach or suggest the capacitive sensor integrated within the keymat as recited in Independent Claim 58. Since Bick, Seely and Kleinhans, alone or in combination, fail to teach or suggest at least one element recited in Independent Claim 58, Applicants respectfully contend that Independent Claim 58 is not rendered obvious by Bick, Seely and Kleinhans. Therefore, Applicants respectfully submit that Independent Claim 58 is allowable over Bick, Seely and Kleinhans.

Furthermore, since Claims 60-66 depend from Independent Claim 58, Applicants respectfully submit Claims 60-66 derive patentability at least therefrom.

CLAIMS 27-38

Applicants respectfully assert that Bick, Seely and Kleinhans, alone or in combination, fail to teach or suggest subject matter recited within Independent Claim 27. For instance, Independent Claim 27 recites in part:

wherein said capacitive sensing device is coupled to a keymat and a keypad structure, said capacitive sensing device integrated within said keymat.

Applicants respectfully contend that Bick, Seely and Kleinhans, alone or in combination, do not teach or suggest the capacitive sensor integrated within the keymat as recited in Independent Claim 27. Since Bick, Seely and Kleinhans, alone or in combination, fail to teach or suggest at least one element recited in Independent Claim 27, Applicants respectfully contend that Independent Claim 27 is not rendered obvious by Bick, Seely and Kleinhans. Therefore, Applicants respectfully submit that Independent Claim 27 is allowable over Bick, Seely and Kleinhans.

Furthermore, since Claims 28-38 depend from Independent Claim 27, Applicants respectfully submit Claims 28-38 derive patentability at least therefrom.

CONCLUSION

In light of the above listed remarks, Applicants respectfully request allowance of rejected Claims 1-68.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present application.

Please charge any required fees or credit any overpayments to Deposit Account Number: 23-0085.

Respectfully submitted,

WAGNER, MURABITO & HAO LLP

Dated: _____

5/9/05

John P. Wagner, Jr.
Reg. No. 35,398

WESTRIDGE BUSINESS PARK
123 WESTRIDGE DRIVE
WATSONVILLE, CALIFORNIA 95076
(408) 938-9060